

**Federal Defenders  
OF NEW YORK, INC.**

Southern District  
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Southern District of New York  
*Jennifer L. Brown*  
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April 15, 2021

*By ECF and by e-mail*

**MEMO ENDORSED**

Honorable Sidney H. Stein  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *United States v. Victor Castro*, 20 Cr. 637 (SHS)

Dear Judge Stein:

I write on consent (Assistant U.S. Attorney Peter Davis) to respectfully request that the Court adjourn trial in this matter, which is currently scheduled for May 3, 2021. The reason for the request is that the parties have reached a disposition, which is predicated upon Mr. Castro participating in a "safety valve" proffer pursuant to U.S.S.G. § 5C1.2. Solely because of my schedule, we have not been able to schedule the proffer in time to avoid the various deadlines for trial submissions. (I have another trial starting on April 27, 2021 before Judge Castel, and have not been able to devote sufficient time to my many other cases, including that of Mr. Castro.)

Accordingly, I respectfully request that the Court adjourn trial in this matter and schedule a change of plea hearing for a date convenient for the Court after May 17, 2021. If the Court grants the request, I consent on Mr. Castro's behalf to the exclusion of time under the Speedy Trial Act until the next conference date.

Thank you for your consideration of this request.

Respectfully submitted,

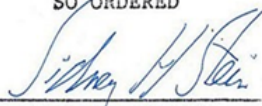
/s/

Martin Cohen

cc: Peter Davis, Esq., by e-mail

**The trial of this matter is adjourned to July 6, 2021, at 9:30 a.m. If the defendant intends to plead guilty, the plea will take place on May 19 at 11:00 a.m. in Courtroom 23A. The time is excluded from calculation under the Speedy Trial Act from today until May 19, 2021. The Court finds that the ends of justice served by this continuance outweigh the best interests of the public and the defendant in a speedy trial pursuant to 18 U.S.C. Sec. 3161(h)(7)(A).**

**Dated: New York, New York  
April 15, 2021**

SO ORDERED  
  
SIDNEY H. STEIN  
U.S.D.J.